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Office of the Secretary
Federal Communications Commission
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: PR Docket No. 93-133
Amendment of Part 80 of the Commission's Rules Concerning the
General Exemption for Large Oceangoing Cargo Vessels and Small
Passenger Vessels

We also believe that the current geographical limitation on the applicability of the present general exemption to voyages along the coasts of the 48 contiguous states is unnecessarily restrictive and support the Commission's proposal to amend the large cargo vessel general exemption by broadening its applicability to domestic voyages through the Panama Canal Zone, to Alaska, to Puerto Rico and along the coast of the 48 contiguous states, not more than 150 nautical miles from the nearest land with no port of call in a foreign destination.

In reference to proposed rules for CFR 47 Part 80.836 we have the following comments:

80.836 (b)(4)(i) It is now possible and cost effective for a vessel to carry both a standard C satellite terminal which provides telex capabilities and a standard M satellite terminal which provides voice capabilities. Since these two terminals together would support both voice and telex and if it is acceptable to the Commission we believe that this part should specify the carriage of a standard A terminal (voice and telex) or the carriage of both a standard M (voice) and standard C (telex) terminal.

80.836 (b)(4)(ii) Many vessels that sail under the general exemption have a separate 2182 kHz (MF) watch receiver. This part shows a requirement of compliance with Subpart R. specifically

communication. We feel that this part should specify or clarify, if acceptable to the Commission, that vessels with a separate 2182 watch receiver should not be required to supply a reserve power source to the separate 2182 kHz watch receiver because of the fact that if the vessel had lost main and emergency power and was operating its station on reserve power that it would most likely not be able to respond to another ships distress situation.

80.836 (b)(4)(vii) Effective 01 Aug 93 the United States Coast Guard communication stations and cutters will discontinue watchkeeping on the distress frequency of 500 kHz. This is because there are now more efficient telecommunication systems available such as INMARSAT, radio telex (SITOR), MF/HF single side band and VHF radiotelephone. The United States Coast Guard states that these other systems provide sufficient redundancy to ensure that adequate distress and safety communication capabilities are available. We are under the same opinion and feel that if a vessel sailing under the General Exemption (which does not have a radio telegraph operator and could only tape record the morse code message) were to receive a distress message on 500 kHz and recorded such message, it would no longer be able to relay same message to the United States Coast Guard since the service will be discontinued and that the same tape recorded morse code message could not be reliably transmitted to a coast station using single side band and that vessel probably would not have ready access to any given coast station's telephone number to call via satellite and that if a vessel were in a distress situation it would most probably rely on the distress frequency of 2182 kHz and not on 500 kHz. With this we feel that, if acceptable to the Commission, the 500 kHz autoalarm receiver requirement should be discontinued. This would also effect 80.836 (b)(4)(vi).

Sincerely,



David Shoemaker
Del Mar Electronics

cc: Basil Andriopoulos - Marine Transport Lines
cc: Giuliano Girometta - Texaco Marine Services